

# **EXHIBIT A**

**EXHIBIT A TO DEFENDANTS' MOTION TO EXCLUDE  
SUZANNE PARISIAN, M.D. [WAVE 3]**

Pursuant to the third Amended Docket Control Order, Defendants submit the following list of cases apply to Defendants' Motion to Exclude Suzanne Parisian, M.D. in Wave 3.<sup>1</sup>

**List of Applicable Cases**

<b>Case and Docket Number</b>	<b>Product(s)</b>
<i>Allmon, Mary Loretta v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-2999	Prolift +M (also Posterior; TVT Obturator)
<i>Brooks, Mattie J. v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-2865	TVT Secur
<i>Brusseau, Lottie Quay &amp; Edward v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-2819	TVT Secur
<i>Rutherford, Jamie B. Andrews &amp; Steven v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-2959	Prolift +M
<i>Thomas, Shari &amp; Ronnie L. v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-3130	TVT Secur

Dr. Parisian was designated as an expert in the following cases but did not serve a report with respect to the product(s) in issue. On September 15, 2016, the parties entered into a Stipulation whereby Plaintiffs agreed to withdraw Dr. Parisian as a designated expert for these matters. The Stipulation has been filed in each of these individual cases.

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<sup>1</sup> Plaintiffs' designation states that they recognize the Fourth Circuit's affirmance of this Court's exclusion of evidence of compliance with the 510(k) process and "reserve the right to designate" Dr. Parisian "[i]n the event of a contrary ruling." Pls. General Expert Desig., p. 2 (attached to Defendants' Motion to Exclude). Ethicon understands this to mean that Dr. Parisian is not designated at all if no FDA evidence is admitted, even though this is potentially inconsistent with Dr. Parisian's current disclaimer of reliance on FDA regulations. In addition, Ethicon notes that this "reservation of right to designate" in some instances puts Plaintiffs' number of experts over the allotted five.

<b>Case</b>	<b>Product(s)</b>
<i>Joann S. Bradley v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-03162	Gynemesh PS
<i>Susan Elizabeth Clones v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02799	TVT
<i>Glenna T. Hensley v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-03119	Prolene Mesh; Prolift Posterior; TVT Obturator
<i>Karen A. &amp; Thomas F. Lyszczarz v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02689	Prolift Total
<i>Donna J. &amp; Joe Moosman v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02805	TVT
<i>Victoria McMurphy Soltanshahi v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02688	TVT
<i>Kathleen Toennies v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02687	TVT
<i>Kelly L. &amp; John D. White v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-03129	Prolift Total; TVT Exact
<i>Geraldine R. &amp; John Yaletchko v. Ethicon, Inc. et al.</i> , Case No. 2:12-cv-02401	Prolift Anterior